

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

Warren S. Wolf, Esquire  
**GOLDBERG & WOLF, LLC**  
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Cherry Hill, New Jersey 08003  
856-651-1600  
Attorneys for Plaintiffs

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MICHAEL MORENO and  
MEDPRO, INC

Plaintiffs,

v.

RORY E. TRINGALI

Defendant.

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Civil Action No.:  
14-CV-04002-JBS-KMW

**ORDER TO SHOW CAUSE**

**THIS MATTER** having been brought before the Court by Goldberg & Wolf, LLC, attorneys for Plaintiffs, Michael Moreno and Medpro, Inc., originally filed in state court and subsequently transferred to this Court pursuant to 28 U.S.C. sec. 1442(a), seeking relief by way of preliminary injunction on the return date set forth below pursuant to Fed.R.Civ.P. 65 and L.Civ.R. 65.1(b) based upon the facts set forth in the Verified Complaint, Memorandum of Law and other documents filed herewith and for good cause shown;

**IT IS ORDERED** that Defendant, Rory E. Tringali, appear and show cause before the

Jerome B. Simandle, Chief U.S.D.J., Courtroom 4A, Mitchell H. Cohen Building and United States Courthouse, 4th & Cooper Streets, Camden, New Jersey at \_\_\_\_\_ m or as soon thereafter as counsel can be heard, on the \_\_\_\_ day of \_\_\_\_\_, 2014 why an order should not be issued preliminarily enjoining, restraining and ordering Rory E. Tringali as follows:

1. Defendant must immediately remove all references to either Plaintiff on the website <http://justin-williams-brooke-horan-williams-laser-fraud-crooks.com> or any other websites upon which the Defendant can control their content.
2. Defendant must cease and desist from defaming the Plaintiffs or attempting to cast the Plaintiffs in a negative light to anyone;
3. Defendant must cease and desist from contacting any of Plaintiffs' customers;
4. Defendant must cease and desist from attempting to contact the Plaintiffs;
5. The Defendant shall not be permitted to be within a one (1) mile radius of the of Moreno's home located at 17 Tuxedo Court, Marlton, New Jersey;
6. Defendants must not defame or disparage Plaintiffs, within the business community.
7. Defendant must immediately delete any posts about the Plaintiffs on any community websites, blogs, industry chat rooms, reviews, etc. which cast either Plaintiff in a negative light.
8. Defendant must refrain from trying to obtain, distribute or publicize any personal information about the Plaintiffs or Michael Moreno's family members including, but not limited to, social security numbers, bank account numbers, tax returns,

home addresses or telephone numbers, real estate property values, etc. and

9. Granting such further relief as the Court may deem just and equitable.

And **IT IS FURTHER ORDERED** that:

1. A copy of this Order to Show Cause shall be served upon Defendant's counsel within \_\_\_\_ days of the date hereof.
2. Defendant shall file and serve a written response to this Order to Show Cause and the request for entry of injunctive relief and proof of service by \_\_\_\_\_, 2014.
3. The Plaintiff must file and serve any written reply to the Defendant's order to show cause opposition by \_\_\_\_\_, 2014.

Dated:

\_\_\_\_\_  
Jerome B. Simandle, Chief U.S.D.J.